## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SARA WILSON CELONA, Plaintiff,	) ) )
V.	) ) Docket No: 1:15-cv-11759
DAVID J. SCOTT,	) Docket No. 1.15-CV-11759
in his official capacity as	)
Pepperell Chief of Police,	)
Defendant.	)
	)
	)

## JOINT PROPOSED SCHEDULING ORDER

Now come the Parties, and request an order for discovery and a proposed schedule. The Parties request that the filing of motions and pretrial scheduling as follows:

- 1. All automatic discovery will be exchanged by August 24, 2015, which is 14 days from the scheduling conference that is set for August 10, 2015, pursuant to Fed.R.Civ.P. 26(a)(1)(c).
- 2. All written discovery requests will be served by October 9, 2015, which is 60 days from the scheduling conference.
- 3. All motions to amend pleadings to add parties, complying with Local Rule 15.1(B), (which requires seeking an amendment that would add a new party to serve the motion to amend on the proposed party at least 10 days prior to filing), be served by November 8, 2015, which is 90 days from the scheduling conference.
- 4. All non-expert depositions will be completed by December 8, 2015, which is 120 days from the scheduling conference.
- 5. The parties do not anticipate the use of trial experts.
- 6. The parties do not anticipate the taking of any expert depositions.
- 7. Parties shall file their Summary Judgment motions, if any, by February 8, 2016, which is 182 days from the scheduling conference.
- 8. Parties' Opposition to Motions for Summary Judgment shall be filed by March 9, 2016, which is 212 days from the scheduling conference to which opposing Party may reply by March 30, 2016.

Counsel will appear again before this court for a status conference thereafter.

Respectfully submitted, Plaintiff, Sara Celona, By her attorney /s/ J. Steven Foley

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By the Town Counsel for the Town of Pepperell and Attorney For Defendant David Scott

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the within Parties' Proposed Scheduling Order document was this day served upon Parties via the Federal Court's ECF Notice and delivery System to all parties. SIGNED under the pains and penalties of perjury.

Dated: August 6, 2015 /s/ J. Steven Foley